



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

November 17, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Draft Financial Capability Assessment Report
(Revised November 2016)

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

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PLANT & MAINTENANCE

☐ 610-876-5523
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Delaware County Regional Water Quality Control Authority (DELCORA)
CSO Long Term Control Plan Update

Draft Financial Capability Assessment Report (Final)

May 2016
(Revised November 2016)



GREELEY AND HANSEN

Draft Financial Capability Assessment

Section 1

Historically, DELCORA has characterized its service areas as “Eastern” and “Western.” The Western service area discharges to DELCORA’s WRTP. The Eastern service area discharges to the Philadelphia Water Department’s Southwest Water Pollution Control Plant (PWD-SWPCP). Being hydraulically connected to the PWD-SWPCP, the Eastern Service Area will pay \$178 million for a portion of the Philadelphia 25 year LTCP. In 2002, DELCORA completed the installation of a force main that connects the Eastern Service Area’s Central Delaware Pump Station (CDPS) to the Chester Force Main. This connection allows DELCORA to send flow from the CDPS to the WRTP. Flows above 20 MGD are to be directed to the PWD-SWPCP. As such, dry weather flow and a portion of the wet weather flow from the Central Delaware County Authority in the Eastern Service Area are discharged to the WRTP.

Under National Pollutant Discharge Elimination System (NPDES) Permit No. PA0027103, issued and administered by the PADEP, DELCORA is authorized to discharge from the WRTP (Outfall 001), four storm water outfalls at the WRTP (028-031) and from 26 combined sewer overflow (CSO) outfalls (002-026, 032, 033) that ultimately discharge to the Delaware River, Chester Creek and/or Ridley Creek. There are a total of 26 combined sewer overflow (CSO) outfalls listed with 25 discharge points (Outfalls 009 and 010 both discharge at Outfall 009) in DELCORA’s existing NPDES Permit.

The combined sewer area simulated in DELCORA’s existing Hydrologic and Hydraulic (H&H) is located within Chester City and consists of a drainage area of approximately 1,150 acres. It comprises approximately half of Chester City’s serviced area. To support this service area, DELCORA owns and operates over 129 miles of separate and combined sewers. Included in the 129 miles of sewers are: 11.7 miles of an interceptor system; 3,209 manholes; and twenty-five (25) combined sewer outfall regulators controlling storm overflows. The location of Chester City’s service area is illustrated in Figure 1-2.

1.1.1 Model Area

As described in the Consent Decree, this Draft FCA will evaluate the Model Area comprising those areas hydraulically connected to the WRTP. Paragraph 14.b of the Consent Decree describes the Model Area as follows:

... all areas tributary to the entire Collection System, as well as all areas tributary to all municipal wastewater collection and transmission systems that are, as of the date the LTCP is submitted, hydraulically connected to, or that directly or indirectly influence flow to, the CSOs and/or the WRTP, regardless of who owns or operates the system(s), including but not limited to the entire “Western Service Area” and “Eastern Service Area” depicted on Figure 1-2 of the Long-Term Control Plan submitted by DELCORA in April 2012, and attached as Appendix A hereto (collectively, the “Model Area”).

As shown in the schematic of DELCORA’s conveyance system (see Figure 1-1), the conveyance system is divided into the Western Service Area and the Eastern Service Area. The Western Service Area discharges to DELCORA’s WRTP and is therefore included in the Model Area. The Eastern Service Area is served by three pumps stations: the Central Delaware Pump Station, the Muckinpates Pump Station and the Darby Creek Pump Station. Up to 20 MGD (which includes both dry and wet weather flows) from the Central Delaware Pump Station can be pumped to, and thus is hydraulically connected to, DELCORA’s WRTP. Therefore, municipalities connected to the Central Delaware Pump Station are considered part of the Model Area. Sewage from the Muckinpates Pump Station and the Darby Creek Pump Station flows to the PWD-SWPCP rather than to the WRTP. Therefore, municipalities connected to these pump stations

Draft Financial Capability Assessment

Section 1

are not hydraulically connected to the WRTP and do not directly or indirectly influence CSOs or flow to the WRTP, and, therefore, are not considered part of the Model Area. In summary, the Model Area includes the municipalities in the Western Service Area plus those municipalities in the Eastern Service Area that are connected to the Central Delaware Pump Station, as described in Table 1-1.

Table 1-1: Model Area

Municipality ID No.	Municipality	Service Area
1	Aston Township	Western
2	Bethel Township	Western
3	Brookhaven Borough	Western
4	Chester City	Western
5	Chester Township	Western
6	Eddystone Borough	Western
7	Edgmont Township	Eastern
8	Lower Chichester Township	Western
9	Marcus Hook Borough	Western
10	Marple	Eastern
11	Middletown Township	Western
12	Morton	Eastern
13	Nether Providence	Eastern and Western
14	Newtown Township	Eastern
15	Parkside Borough	Western
16	Prospect Park	Eastern
17	Ridley Park Borough	Eastern
18	Ridley Township	Eastern
19	Rose Valley Borough	Western
20	Rutledge	Eastern
21	Springfield	Eastern
22	Swarthmore	Eastern
23	Trainer Borough	Western
24	Upland Borough	Western
25	Upper Chichester Township	Western
26	Upper Providence Township	Eastern and Western

